

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

DARREN A. BRITTO, GABRIEL A.  
TAUSCHER, and SHAWN M. KROLL,

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES,

Defendant.

Case No. 2:23-cv-00019-Z

**CMMG INC.'s MOTION TO INTERVENE**

CMMG, Inc. (“CMMG”) respectfully moves to intervene as plaintiff in the above-captioned case for the purposes of challenging the legality of Defendant’s Final Rule. Specifically, CMMG moves to intervene as a matter of right under Fed. R. Civ. P. 24(a). CMMG has timely filed this Motion; it has a protected interest relating to this action; if not allowed to intervene, its interest would be impaired by this action; and its interest is not adequately represented by the existing parties to this action.

Alternatively, CMMG asks this Court to exercise its broad discretion under Rule 24 to allow CMMG to permissively intervene, as its claims and this action share common questions of law. Furthermore, permissive intervention will not unduly delay or prejudice the adjudication of the rights of the parties to this lawsuit.

Because CMMG meets its burden under Rule 24, the Court should grant CMMG’s request and allow it to intervene in this action. The reasons set forth above are fully supported by the accompanying brief filed concurrently with this Motion. A proposed order is also attached.

February 17, 2023

/s/ Dusty J. Stockard  
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*Counsel for Proposed Intervenor CMMG, Inc.*

**CERTIFICATE OF CONFERENCE**

Undersigned counsel certifies that counsel for the moving party conferred with counsel for Plaintiffs and Defendant prior to filing this Motion. On February 17, 2023, Lucas Vebber, counsel for Plaintiffs, sent an email to counsel for the moving party stating the Plaintiffs consent to the Motion. On February 17, 2023, Michael Drezner, counsel for the Government, sent an email to counsel for the moving party stating that the Government intends to oppose the Motion.

Dated: February 17, 2023

/s/ Dusty J. Stockard  
Dusty J. Stockard